



Dear Council Members:

Delta Dental of Illinois, an Illinois not for profit dental service plan corporation, appreciates the opportunity to respond to your invitation for comments regarding the option of establishing an Insurance Exchange in Illinois.

Meaningful Choice: As the Council noted, "the Exchange will be a consumer friendly tool to easily compare health plan options." In order to effect comparison of health plan options and afford consumers a meaningful choice, the Exchange needs to require that certain components of essential health benefits are offered and priced separately. The provision of pediatric oral care services is a case in point. The value and price of a particular issuer's pediatric dental benefits needs to be indicated separately from medical benefits. This will allow consumers to compare one pediatric dental offering with another pediatric dental offering. If consumers come to the Exchange and attempt to shop among products that bundle or integrate dental coverage with medical coverage but the value of the dental offering is not transparent and the dental portion of the premium is hidden in the overall cost of coverage, they will have no basis for making a true comparison.

State Exchange: Illinois should not cede control of the provision of health care for the citizens of Illinois or the regulation of issuers of qualified health plans to a multi-state Exchange or federally-operated Exchange. The various decisions that need to be made in establishing the Exchange are best made by the State given the differences among states as to the nature of their insurance market and the political climate within the states.

Regulation of Individual and Small Group Marketplace: To the extent that Illinois adopts an Exchange model of selectively contracting with plans, state regulation of the market should be the same both outside and inside the Exchange. Beginning in 2014, health plans in the individual and small group markets outside the exchange must also offer the "essential health benefits" as defined by the Secretary of the Department of Health and Human Services. State regulation of the essential benefits outside the Exchange including how they are offered and the pricing of the benefits should be identical to state regulation of the essential health benefits within the Exchange.

Recognition of the Importance of Pediatric Dental Health to Overall Health: Although there are fiscal constraints on the State's resources, the descriptive and evaluative information available to consumers must also include an outreach program to educate the public on the interrelationship of dental health to one's overall health.

OFFICE OF THE ATTORNEY GENERAL

Best Regards,

A handwritten signature in black ink, appearing to read "Bernard Glossy".

Bernard Glossy, FACHE

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DEC 06 2010

Governor's Chicago Office